

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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JORGE PILAR GARCIA, ZACHARY	:
DUCLOS, GEORGE KENT, and JENNIFER	:
MILLER, on behalf of themselves and all others	:
similarly situated,	:
	:
Plaintiffs,	:
	:
v.	:
	:
E.J. AMUSEMENTS OF NEW HAMPSHIRE,	:
INC. d/b/a FIESTA SHOWS; FIESTA SHOWS,	:
INC. d/b/a FIESTA SHOWS; ATSEIF	:
FESTIVAL MOBILE, INC. d/b/a FIESTA	:
SHOWS; EUGENE DEAN III; EUGENE	:
DEAN; LINDA CHAGROS; NORMA DEAN;	:
and MARY DEAN,	:
	:
Defendants.	:
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Case No. 1:13-cv-12536-PBS

ORAL ARGUMENT
REQUESTED

NON-PARTY CENTRO DE LOS DERECHOS DEL MIGRANTE, INC.'S
MOTION TO QUASH SUBPOENA AND FOR A PROTECTIVE ORDER

Pursuant to Rules 26(c) and 45(d) of the Federal Rules of Civil Procedure and Rules 7.1 and 37.1 of the Local Rules of this Court, Centro de los Derechos del Migrante, Inc. ("CDM"), a non-party to this action, respectfully moves this Court to quash the subpoena in full that was issued to CDM by Defendants. CDM, a non-profit migrant rights and legal services organization, respectfully asserts that it seeks a protective order that it will not be required to produce: (1) research materials, including interviews with vulnerable migrant workers, used to prepare the academic research report *Taken for a Ride*; (2) documents reflecting legal advice CDM provided to migrant workers in furtherance of its organizational mission; or (3) documents reflecting CDM's other confidential and strategic advocacy efforts on behalf of its clients.

The grounds for this motion are set forth in the accompanying memorandum of law submitted herewith.

WHEREFORE, CDM respectfully requests that this Court grant the foregoing motion and enter an order consistent with the relief requested.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), CDM respectfully requests a hearing on this motion.

LOCAL RULE 7.1 AND 37.1 CERTIFICATION

Counsel for CDM hereby certifies that it has conferred with counsel for the Defendants and has attempted in good faith to resolve or narrow the issues involved in this motion. Counsel for CDM further certifies that it has complied with the provisions of Rule 37.1 of the Local Rules of this Court. As required by Rule 37.1, details of the conference are set forth in the accompanying memorandum of law.

Dated: August 8, 2014
Boston, Massachusetts

Respectfully submitted,

/s/ Kurt Wm. Hemr
Kurt Wm. Hemr (BBO #638742)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
500 Boylston Street
Boston, Massachusetts 02116
(617) 573-4800
kurt.hemr@skadden.com

Miriam Tauber
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, NY 10036
(212) 735-2838
Of Counsel

Counsel for Non-Party
Centro de los Derechos del Migrante, Inc.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on August 8, 2014.

Dated: August 8, 2014

/s/ Kurt Wm. Hemr
Kurt Wm. Hemr